REMARKS

This is intended as a full and complete response to the Office Action dated March 20, 2007, having a shortened statutory period for response set to expire on June 20, 2007. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-17, 26-41, 50 and 51 are pending in the application. Claims 1-17, 26-41, 50 and 51 remain pending following entry of this response. Claims 1, 9, 26, 33, 50 and 51 have been amended. Applicants submit that the amendments do not introduce new matter.

Claim Rejections - 35 U.S.C. § 101

Claims 1-17, 26-41, 50-51 are rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Applicants have amended claims 1, 9, 26, 33, 50 and 51 with this response include a step of storing a result. Applicants submit, therefore, claims 1, 9, 26, 33, 50 and 51 are limited to statutory subject matter. Accordingly, Applicants request that the rejection of these claims be withdrawn. Claims 2-8, 10-17, 27-32 and 34-41 are dependent on claims 1, 9, 26 and 33 respectively, and as such, Applicants request that the rejection of these claims be withdrawn.

Claim Rejections - 35 U.S.C. § 102

Claims 1-17, 26-41, 50-51 are rejected under 35 U.S.C. 102(a) as being anticipated by Bert *Scalzo* ("Oracle DBA Guide to Data Warehousing and Star Schema"), hereinafter "*Scalzo*".

Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9

Page 12

USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

Regarding claims 1, 26, and 50:

Applicants submit that *Scalzo* does not teach a "method of managing execution of query operations in a data processing system" that includes "selecting one of the plurality of subsequent query operations based on the operation status; performing the selected query operation; updating the operation status; and managing execution of the remaining subsequent query operations" as recited by claim 1. Claims 26 and 50 recite a similar limitation. *Scalzo* teaches "issuing, by a requesting entity, a request to perform a composite query operation defined by at least an initial query operation and a subsequent query operation." However, the "upsert operation" provided by *Scalzo* only teaches the execution of an "UPDATE" operation or, upon failure, an <u>alternative</u> "INSERT" operation as seen on pages 7-8. In contrast, claim 1 recites a "method of managing execution of query operations in a data processing system" that includes both executing both "an initial query operation" and one of a plurality of "subsequent query operations." Further, an operation status may be updated, based on the results of the subsequent query operation. Thereafter, any remaining subsequent query operations may be managed on the basis of the updated operation status. Claims 26 and 50 recite a similar limitation. Applicants submit that the "upsert operation," which includes only performing an "update" operation and upon failure of the "update" operation, performing an "insert" operation, fails to disclose these limitations.

Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested. Accordingly, claims 2-8 and 26-32 being dependent upon claims 1 and 26, respectively, are believed to be allowable for the same reasons, and allowance of the claims is respectfully requested.

Regarding Claims 9, 33 and 51:

Applicants submit that *Scalzo* does not teach a "method of managing execution of query operations in a data processing system" that includes "managing, using a

composite query operations manager, execution of the initial query operation and the plurality of subsequent query operations on the basis of selection logic and the plurality of failure conditions" as recited by claim 9. Claims 33 and 51 recite a similar limitation. The Examiner suggests that pages 7-8 of *Scalzo*, relating to an "upsert operation," teaches "managing, using a composite query operations manager, execution of the initial query operation and the plurality of subsequent query operations on the basis of selection logic and the plurality of failure conditions." However, pages 7-8 only teach the execution of an "UPDATE" operation or, upon failure, an <u>alternative</u> "INSERT" operation. In contrast, as amended, we claim a "method of managing execution of query operations in a data processing system" that includes "execution of the initial query operation and <u>the plurality of subsequent query operations</u>." In *Scalzo*, the only way the "INSERT" operation is executed is if the "UPDATE" operation fails, and further, no subsequent operations are performed as a result of either the success or failure of the "INSERT" operation.

Therefore, claims 9, 33, and 51 are believed to be allowable, and allowance of the claims is respectfully requested. Accordingly, claims 10-17 and 34-41 being dependent upon claims 9 and 33, respectively, are believed to be allowable for the same reasons, and allowance of the claims is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

/Gero G. McClellan, Reg. No. 44,227/
_____

Gero G. McClellan
Registration No. 44,227
PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicant(s)